

REMARKS

In the final Office Action issued December 27, 2006, claims 3, 4, 7-12, and 15 were objected to for reciting "[a] method" at the beginning of the respective dependent claims. Claims 1, 3, 4, 6-12, 14, 15, and 18-20 were rejected under 35 U.S.C. §103(b) as being unpatentable over Kothuri et al. (U.S. Patent No. 6,381,605) in view of a publication by Chen et al. entitled "Merging R-Trees: Efficient Strategies for Local Bulk Insertion." (March 2002).

Claims 1, 3-4, 6-12, 14-16, and 18-20 are now pending in this application. Claims 1, 3, 4, 6-12, 14, 15 and 18-20 have been amended to more clearly describe what the applicant deems as the invention. Claims 3, 4, 7-12, and 15 have been amended in order to correct the objection.

The applicant respectfully submits that the present invention, according to claims 1, 3-4, 6-12, 14-16, and 18-20 is not unpatentable over Kothuri et al in view of Chen et al. Kothuri disclose a method and system for indexing and storing multidimensional data. The index is created by recursively storing data items in leaf nodes having specified fanouts. The intermediate nodes and the root node are created after the leaf nodes have been created. See Abstract. An entry can be added to the index by traversing the index from the root node to determine the appropriate leaf node in which to add the entry.

Regarding claims 1, 3-4, 6-12, 18, and 19, the present invention, for example, according to claim 1 requires reorganizing the distribution of entries in the nodes where entries were inserted and nodes that are siblings of the nodes where entries were inserted. Kothuri does not disclose or suggest reorganizing entries as now claimed. Rather, Kothuri merely adds entries to the R-tree by traversing the R-tree from the root node and selecting the leaf node that creates the least overlap. In an embodiment the leaf node is partitioned or divided to reduce overlap. Nowhere does Kothuri et al. disclose or suggest reorganizing of the node entries of the divided leaf node and a sibling of the divided leaf node. Accordingly, Kothuri et al fail to teach or suggest the invention claimed by claim 1, and claims 6, 14 and 18-20 that recite limitations similar to claim 1 for the same reasons discussed with respect to claim 1.

Chen et al. fails to cure the deficiencies of Kothuri with respect to claims 1, 6, 14 and 18-20. Therefore, the present invention according to claims 1, 6, 14 and 18-20 is not taught or suggested by Kothuri, alone or in combination, with Chen.

Claims 3, 4, 7, 12, and 15, depend from claims 1, 6, and 14 respectively. Accordingly, claims 3, 4, 7, 12, and 15 are not taught for at least the reasons discussed above with respect to claims 1, 6, and 14.

Each of the claims now pending in this application is believed to be in form for allowance. Accordingly, favorable reconsideration of this case and early issuance of the Notice of Allowance are respectfully requested.

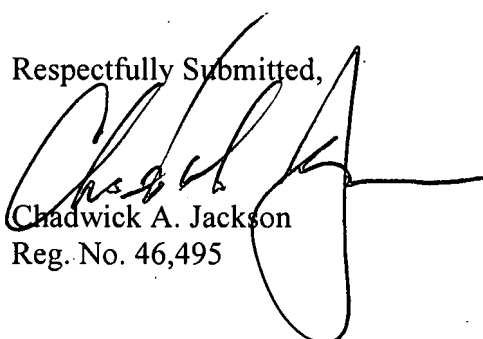
Additional Fees:

The Commissioner is hereby authorized to charge any insufficient fees or credit any overpayment associated with this application to Deposit Account No. 50-4047 (19111.0247).

Conclusion

In view of the foregoing, all of the Examiner's rejections to the claims are believed to be overcome. The Applicants respectfully request reconsideration and issuance of a Notice of Allowance for all the claims remaining in the application. Should the Examiner feel further communication would facilitate prosecution, he is urged to call the undersigned at the phone number provided below.

Respectfully Submitted,


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